

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
COLUMBUS DIVISION**

DIANE OWENS, Individually and on Behalf of All Others Similarly Situated,)	No. 2:20-cv-03785-ALM-KAJ
)	
)	Judge Algenon L. Marbley
Plaintiff,)	Magistrate Judge Kimberly A. Jolson
)	
vs.)	
)	
FIRSTENERGY CORP., et al.)	
)	
Defendants.)	
)	
CHANA FRAND, Individually and on Behalf of All Others Similarly Situated,)	No. 2:20-cv-04287-JLG-EPD
)	
)	Judge James L. Graham
Plaintiff,)	Magistrate Judge Elizabeth Preston Deavers
)	
vs.)	
)	
FIRSTENERGY CORP., et al.)	
)	
Defendants.)	
)	

**PROPOSED LEAD PLAINTIFF LOS ANGELES COUNTY EMPLOYEES RETIREMENT
ASSOCIATION'S MOTION FOR CONSOLIDATION OF RELATED ACTIONS,
APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF LEAD PLAINTIFF'S
SELECTION OF LEAD COUNSEL**

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Liaison Counsel

[Proposed] Lead Counsel for [Proposed] Lead
Plaintiff

PLEASE TAKE NOTICE that Los Angeles County Employees Retirement Association (“LACERA”) hereby moves this Court pursuant to the Private Securities Litigation Reform Act of 1995 for an order consolidating the above-captioned related securities class actions pursuant to Rule 42(a) of the Federal Rules of Civil Procedure, appointing LACERA as Lead Plaintiff, and approving its selection of Robbins Geller Rudman & Dowd as Lead Counsel for the class. This Motion is based upon the Memorandum of Law and Declaration of Joseph F. Murray filed concurrently herewith.

DATED: September 28, 2020

MURRAY MURPHY MOUL + BASIL LLP

s/ Joseph F. Murray

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CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that on September 28, 2020, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses on the attached Electronic Mail Notice List, and I hereby certify that I caused the mailing of the foregoing via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Joseph F Murray

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Mailing Information for a Case 2:20-cv-03785-ALM-KAJ Owens v. FirstEnergy Corp. et al

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

- (No manual recipients)